

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS (Worcester)**

**Anthony Campbell,**

**Plaintiff,**

**vs.**

**Isolation Technologies, Inc.**

**Larry D'Amato**

**Defendants**

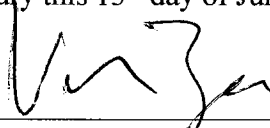
**Case No. 04-40236 FDS**

**AFFIDAVIT OF WILLIAM M. ZALL IN SUPPORT OF DEFENDANT, ISOLATION  
TECHNOLOGIES, INC. MOTION TO STRIKE PLAINTIFF'S STATEMENT OF  
COMPLIANCE WITH ORDER**

I, William M. Zall, hereby depose and state as follows:

1. I am an attorney duly licensed to practice law in the Commonwealth of Massachusetts and counsel of record for the Defendant in the above-referenced matter.
2. I have reviewed the Plaintiff's document entitled "Plaintiff, Anthony Campbell, Is In Compliance With The Court Order Of April 26, 2006 And May 10, 2006 By Hon. Timothy Hillman And Hon. F. Dennis Saylor, IV, To Provide Documents To The Defendant." ("Statement of Compliance")
3. On or about May 15, 2006, I filed "Defendant, Isolation Technologies, Inc., Motion For Sanction of Dismissal" ("Motion to Dismiss"). Included in the Motion to Dismiss is a listing of documents and discovery responses which had not been received, despite the orders of Magistrate Judge Hillman and Judge Saylor compelling discovery.
4. The Plaintiff's Statement of Compliance reflected a list documents, identified by category in four (4) numbered paragraphs. There was only one document among those identified which I had not previously received from the Plaintiff (the second page of his complaint filed with the Attorney General's office, identified as item No. 1). Otherwise, I have not received any additional documents since filing the Isolation's Motion to Dismiss.

Signed under the pains and penalties of perjury this 13<sup>th</sup> day of June, 2006.



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